UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION (AT DAYTON)

In re HUFFY CORP. SECURITIES LITIGATION) Lead Case No. 3:05cv0028
	CLASS ACTION
This Document Relates To:	Judge Walter Herbert Rice Magistrate Judge Sharon L. Ovington
ALL ACTIONS.)
)

DECLARATION OF JOEL MUELLER IN SUPPORT OF LEAD PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

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Liaison Counsel

I, Joel Mueller, declare as follows:

- 1. I respectfully submit this Declaration in Support of Lead Plaintiffs' Motion for Class Certification. I have personal knowledge of the statements herein and, if called upon as a witness, could and would competently testify thereto.
- 2. I am Assistant Vice President at Amalgamated life Insurance Company ("ALICO"). ALICO, through its affiliate, UNITE HERE Fund Administrators, Inc., administers the UNITE HERE National Retirement Fund ("Fund"). The Alaska Hotel & Restaurant Employees Pension Trust Fund ("the Alaska Fund") merged with the Fund effective April 30, 2008. The Fund has approximately 430,000 participants and beneficiaries. Its assets, as of February 18, 2009, were in excess of \$1.8 billion. As the Assistant Vice President of ALICO, I assist in the day-to-day management of the Fund and have been authorized to seek appointment as class representative in this action on behalf of the Fund.
- 3. I have reviewed pre-merger trading records of the Alaska Fund. Prior to its merger with the Fund, the Alaska Fund purchased 12,000 shares of Huffy stock during the Class Period at prices ranging between \$6.04 and \$8.50. Attached hereto as Exhibit A is a true and correct copy of the Alaska Fund certification filed with the Consolidated Complaint in this Action.
- 4. The Fund is a collectively bargained multiemployer pension fund. Its Board of Trustees is composed of an equal number of individuals selected by UNITE HERE as selected by employers contributing to the Fund.
- 5. The Fund understands that the Private Securities Litigation Reform Act of 1995 was intended to encourage institutional investors and others with meaningful losses to seek to direct securities class actions. The Fund is a large, sophisticated institutional investor committed to vigorously prosecuting this litigation. The Fund intends to obtain the largest recovery for the class consistent with good faith and sound judgment.

- 6. On behalf of the Fund, I am supervising and monitoring the progress of this litigation and the active participation of Fund representatives in its prosecution. For example, I supervise Fund representatives who collect materials for discovery, assist in answering interrogatories, and review pleadings and other documents in the case, including the Consolidated Class Action Complaint for Violation of the Federal Securities Laws.
- 7. The Fund is committed to continuing to actively direct this litigation and maximize the recovery for the class by attending hearings, depositions and/or trial and overseeing the preparation and filing of pleadings, as appropriate. Further, the Fund understands that it owes a fiduciary duty to all members of the proposed class to provide fair and adequate representation and intends to continue to work with Lead Counsel to obtain the largest recovery for the whole class consistent with good faith and meritorious advocacy.
- 8. The Fund intends to continue to provide fair and adequate representation by, among other things, directing the efforts of its selected counsel, Coughlin Stoia Geller Rudman & Robbins LLP ("Coughlin Stoia").
- 9. The Fund has selected Coughlin Stoia as its proposed Class Counsel based on the firm's substantial experience and expertise in prosecuting securities class actions.
- 10. In addition, the Fund believes that Coughlin Stoia possesses the necessary financial and human resources to prosecute this case effectively.

UNITE HERE NATIONAL RETIREMENT FUND

By: JOEL MUELLER

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Mailing Information for a Case 3:05-cv-00028-WHR

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The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

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